

EXHIBIT L

Expert Report of G. Bristol

Human Trafficking Report: Human Trafficking Investigations Expert

EXPERT REPORT

Submitted to
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Tucker Ellis LLP
100 South Fourth Street, Suite 600
St. Louis, Missouri

In the matter of
H.B., Plaintiff, v.
Red Roof Inns, Inc.,; FMW RRI I, LLC;
RRI West Management, LLC, Defendants.

Civil Action File No. 1:22-cv-01181-JPB
In the U.S District Court for the
Northern District of Georgia – Atlanta Division

Prepared by
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CONFIDENTIAL
Dated: July 26, 2023

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I. INTRODUCTION

My name is Greg H. Bristol. I am a human trafficking law enforcement investigations subject matter expert and an independent contractor with Break the Chain LLC (“BTC”). My expertise is in identifying, investigating, and facilitating the prosecution of human traffickers in the criminal justice context.

BTC is a Virginia business that offers human trafficking expert witness testimony and anti-trafficking training assistance. Through BTC, I have been retained as an expert witness consultant on human trafficking law enforcement investigations by the law firm Tucker Ellis LLP on behalf of the defendants.

My CV is listed at Attachment A. My compensation rate is listed in Attachment B. A list of the materials that I reviewed is in Attachment C. And my prior testimonial history is provided in Attachment D.

I reserve the right to amend my analysis, opinions, and this report should additional information be made available after my report is submitted.

In this report, my opinions relate to the following claims made by Plaintiff in her First Amended Complaint, filed on March 6, 2023:

1. Defendants knew of alleged rampant sex trafficking and prostitution at Red Roof Inn, 5171 Brook Hollow Parkway, Norcross, Georgia (RRI Norcross) for years, before, during, and after Plaintiff’s trafficking. (Amended Complaint, Page 2)
2. Defendants knew or should have known that their operation of RRI Norcross violated the Trafficking Victims Protection Reauthorization Act (TVPRA), 18 U.S.C. § 1591, through its association with Plaintiff’s alleged sex traffickers. (Amended Complaint, Page 3)

In addition to the opinions I make in this report, I also reserve the right to offer additional opinions in rebuttal following my review of the conclusions put forth in Plaintiff’s Expert Report prepared by Fred Del Marva, dated June 22, 2023.

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I have agreed to formulate with honesty and due care my opinions in the areas of human trafficking law enforcement-related issues where I am qualified to render an opinion. I have told my client that my opinions are not preordained and might be contrary to their position. My opinions are derived from three key areas:

- Documents and materials reviewed, listed in Attachment C;
- My involvement and experience in federal government prosecutions of human traffickers who specifically trafficked their victims at hotel and motel locations; and
- My experience, education, training, skills, and knowledge in the field of law enforcement human trafficking investigations more broadly.

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II. QUALIFICATIONS

In this section, I will:

- A. Describe my education and career
- B. List human trafficking presentations and courses I have given
- C. List courses that I have taught in Georgia
- D. List publications I have authored in the area of human trafficking

Based on all this education, training, and experience, I am qualified to give opinions on human trafficking law enforcement investigations, and I have been retained as an expert in over a dozen cases across the country.

A. Education & career

I graduated from Michigan State University with a B.A. from their School of Criminal Justice in June 1978. My career in law enforcement began shortly thereafter, when I joined the Michigan State Police as a state trooper in September 1978.

I joined the Federal Bureau of Investigation in 1987, where I worked until 2010, in a variety of assignments, including:

- 2008 FBI Violent Crimes Against Children Program
- 2007 FBI Human Trafficking Coordinator for WFO¹ with DOJ
- 2007 FBI Human Trafficking Task Forces (2)
- 2006 FBI Hate Crimes and Human Trafficking Investigations
- 2002 FBI Corporate Fraud Investigations (Enron Task Force)
- 2001 FBI Terrorism Investigations (9/11)
- 1996 FBI Certified Police Instructor
- 1993 FBI Public Corruption Investigations
- 1988 FBI Foreign Counterintelligence Investigations

After leaving the FBI in 2010, I worked in Afghanistan as a Special Agent with the Special Inspector General for Afghanistan Reconstruction (SIGAR), and was responsible for investigating fraud, waste, and abuse within U.S. federal contracts in Afghanistan.

¹ Washington Field Office.

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From 2012 to 2021, I was the President of the Human Trafficking Investigations and Training Institute (HTITI), LLC, a company that offered law enforcement courses on how to investigate human trafficking crimes. In this position, I created five advanced instructor-led classroom courses. I discuss these courses more in-depth in the next section of my report, but in short, these courses involved students from city, county and state law enforcement agencies interested in obtaining the knowledge not only to identify victims of human trafficking, but also to develop a case properly by obtaining all evidence at the crime scene, interview witnesses that are well documented in written reports, and work in a collaborative way so they can prosecute human traffickers to the full extent of the law.

From 2014 to 2017, I also worked as a contracted Equal Employment Opportunity (EEO) investigator. In this role, I served as an unbiased fact gatherer identifying and securing information through witness interviews and review of written records.

I have also worked as a litigation consultant/expert witness since 2016, when I started providing expert services in financial fraud civil litigations by myself. After obtaining my first engagement on a human trafficking civil case through HTITI in 2020, I have worked as an expert consultant in human trafficking litigations through BTC.

Since 2016, I have provided consulting or expert witness services in 17 state or federal civil litigations, 15 related to human trafficking.

Since 2020, I have also held numerous human trafficking consulting positions for various police departments and law enforcement agencies, as well as educational institutions. A brief description of these consulting positions follows:

- I am currently a DOJ Office for Victims of Crime (OVC), Training and Technical Assistance Center (TTAC) human trafficking consultant. OVC TTAC provides training and technical assistance for victim service providers and allied professionals who serve crime victims.
- I was hired as a paid course developer of Savant Learning Systems, Martin, Tennessee, to help them create a human trafficking online course oriented for police officers in Texas.
- I served as an unpaid consultant with the Massachusetts Institute of Technology's (MIT) Lincoln Laboratory, Cambridge, Massachusetts, developing their Human Trafficking Analytics and Training Program.

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B. Human trafficking presentations and classroom courses

During my tenure as an FBI Special Agent from 1987 to 2010, I gave numerous presentations and taught classroom courses on civil rights topics. These presentations and courses covered a wide variety of topics, including hate crimes and human trafficking. They were intended to educate police and community groups in the Washington, DC area about what human trafficking was, the role the FBI played to arrest human traffickers, and how the public can report suspicions of human trafficking. These police academies and community groups included:

Police Academies:

- FBI Training Academy, Quantico, Virginia
- Fairfax County Criminal Justice Academy, Chantilly, Virginia
- Northern Virginia Criminal Justice Academy, Ashburn, Virginia
- Prince William County Criminal Justice Academy Nokesville, Virginia

Community Groups in the Washington, DC area:

- American-Arab Anti-Discrimination Committee
- Arab American Institute
- Arab Muslim Sikh Advisory Committee
- Coalition of Latino Clergy and Christian Leaders
- Consular Corps of Washington, DC
- Council on American-Islamic Relations
- Human Rights Campaign
- Jewish Federation of Greater Washington
- League of United Latin American Citizens
- National Council of La Raza
- Sikh American Legal Defense and Education Fund
- Stop Modern Slavery – Washington Chapter

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After leaving the FBI, I continued teaching law enforcement about human trafficking issues. Since November 2011, I have taught 28 advanced classroom courses to law enforcement officers in 10 states on how to identify and investigate human trafficking crimes.

I have also given presentations to Police Commanders. The University of Louisville's Southern Police Institute (SPI) offers police commanders and future police commanders an accredited college-level 400-hour Command Officers Development Course (CODC). In 2013, I became a staff instructor with SPI and began teaching a 16-hour course about human trafficking at the following CODC locations:

- 2015 Fort Lauderdale and Orlando
- 2014 Fort Lauderdale
- 2013 Fort Lauderdale and Daytona Beach.

Additionally, I have given numerous human trafficking presentations at academic institutions. These presentations focused on defining what human trafficking was, and how police officers should build a case to prosecute traffickers. They were given to a wide variety of students, from grade school to college. A list of the institutions I presented at includes:

- 2018 DC Center City Public Schools
- 2018 DC Georgetown University
- 2017 FL St. Thomas University's School of Law's Human Trafficking Academy
- 2016 FL St. Thomas University's School of Law's Human Trafficking Academy
- 2015 FL St. Thomas University's School of Law's Human Trafficking Academy
- 2015 VA Hermitage High School
- 2014 DC John Hopkins University
- 2014 DC Georgetown University
- 2014 MD Montgomery College
- 2014 VA Hermitage High School
- 2013 DC American University
- 2013 VA Hermitage High School and Patrick Henry Community College

I have given 63 presentations in the United States on various law enforcement topics, including human trafficking.² These presentations are in addition to those listed above and reflect my efforts in building collaborations to expose human traffickers.

² Itemized in CV.

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I have also given presentations internationally on human trafficking issues. Specifically, I was hired by the U.S. Department of State to conduct several anti-human trafficking presentations for the public at the U.S. Embassy in Cairo, Egypt (2018), and to meet Egyptian law enforcement officials to explain how American law enforcement investigated human trafficking crimes. I also participated at an anti-human trafficking conference in Vienna, Austria, hosted by the United Nations Office on Drugs and Crime (2017) and taught a two-week course to law enforcement officers in the Republic of Trinidad & Tobago on how to investigate human trafficking crimes (2015).

C. Teaching human trafficking issues in Georgia

I have taught classroom courses to police departments in Georgia on how to investigate human trafficking crimes, on the following dates:³

- 11/20/2011: Hosted by Kennesaw Police Department⁴
- 4/25/2012: Hosted by Kennesaw Police Department⁵
- 9/10/2012: Hosted by Roswell Alpharetta Public Safety Center⁶
- 6/26/2017: Hosted by Cobb County Police Department

Topics discussed in these four courses included the following:

- Introduction to human trafficking crimes
- The Trafficking Victim's Protection Act of 2000
- Understanding applicable state & federal laws
- Responsibilities of Federal agencies
- Protections and benefits for victims of human trafficking
- Resources for law enforcement officers to address this crime
- How to interview victims of human trafficking
- Child sexual exploitation

In 2011 and 2012, the training officer of the hosting Georgia police departments certified these courses for credit with the Georgia Peace Officer Standards and Training Council (GA POST). By letter dated 11/22/2016, GA POST advised that they approved my training and requested that HTITI's 2017 24-hour courses be eligible for GA POST credits.

³ The course is titled "Advanced Law Enforcement Human Trafficking Investigator."

⁴ Taught jointly with NECI911 (www.NECI911.com).

⁵ Ibid.

⁶ Ibid.

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In addition to these courses for police officers, I have also taught courses on human trafficking issues at other Georgia institutions, including:

- On 4/12/2012, I gave a one hour presentation on *Human Trafficking Awareness* to SunTrust Bank Financial Intelligence Unit, Atlanta, Georgia.
- On 10/27/2015, I gave a two-hour presentation *How Homeless People Can be Victims of Forced Labor*, at the Georgia Alliance to End Homelessness Annual Conference, Savannah, Georgia.
- On 9/14/2016, I gave a two-hour presentation *How Homeless People Can be Victims of Forced Labor*, at the Georgia Alliance to End Homelessness Annual Conference, Savannah, Georgia.

D. Published works

In addition to my education, training, and experience, I have also published on human trafficking issues:

- *Suing Social Media Sites Won't Curb Sex Trafficking: Advocates*, The Crime Report (www.thecrimereport.org), November 30, 2021 (co-author)
- *Combatting Human Trafficking Takes Everyone*, American Gas Magazine, June 2018 (co-author)
- *Model Policy on Human Trafficking*, Virginia Department of Criminal Justice Services' November 2014 (contributor)

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III. SUMMARY OF CURRENT CASE

Plaintiff alleges that she is a minor victim of sex trafficking, who was trafficked in and around January 2012 at a Red Roof Inn, located at 5171 Brook Hollow Parkway, Norcross, Georgia (RRI Norcross).⁷

Plaintiff alleges that Defendants knew of the rampant sex trafficking and prostitution at RRI Norcross for years, before, during, and after Plaintiff's trafficking, because of the following:⁸

- the facts of this specific Plaintiff while she was allegedly trafficked for sex as a minor at the hotel;
- the Defendants' employees were complicit in allegedly assisting Plaintiff's sex traffickers in the sex trafficking of Plaintiff;
- the Defendants' employees allegedly knew of and permitted sex trafficking and prostitution to occur at the hotel;
- the facts of other alleged sex trafficking victims at the hotel before, during, and after Plaintiff;
- the frequent and ongoing similar crimes occurring at the hotel;
- the reports of hotel guests to Defendants allegedly regarding sex trafficking and prostitution-related activities; and
- Defendants' knowledge of sex trafficking generally, in the Atlanta area, and at the RRI Norcross specifically.

Plaintiff alleges that Defendants knew or should have known that their operation of RRI Norcross violated TVPRA.⁹

Plaintiff alleges that Defendants permitted RRI Norcross to be used for the purpose of prostitution, in violation of Georgia laws.¹⁰

⁷ Amended Complaint, Page 1, ¶ 1.

⁸ Amended Complaint, Pages 2-3, ¶ 4.

⁹ Amended Complaint, Page 3, ¶ 5a.

¹⁰ Amended Complaint, Page 4, ¶ 5b.

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Plaintiff alleges that while she was trafficked for sex at RRI Norcross, she exhibited numerous well-known and visible signs of a minor sex trafficking victim, of which Defendants knew or should have known.¹¹

Plaintiff alleges that while she was trafficked for sex at RRI Norcross, her rooms had evidence of well-known and visible signs of sex trafficking, of which Defendants knew or should have known.¹²

On January 19, 2012, Gwinnett County Police Department opened a prostitution investigation at RRI Norcross. Skii D. Morris, age 21, was arrested there for:¹³

- Keeping a place of prostitution, in violation of §16-6-10
- Pimping, in violation of §16-6-11
- Prostitution, in violation of §16-6-9

Plaintiff stated in her deposition on November 2, 2022, that [REDACTED] was prostituting at RRI Norcross in January 2012, and the police answered an ad in Backpage and found Plaintiff with Morris during a “sting.”

Given these allegations, my analysis will focus primarily on the 2011 to January 19, 2012 timeframe in Gwinnett County, Georgia.

¹¹ Amended Complaint, Page 10, ¶ 23.

¹² Amended Complaint, Page 10, ¶ 24.

¹³ Incident report no. 120006108

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IV. OVERVIEW OF RELEVANT CRIMINAL LAWS

As part of my trainings to law enforcement agencies on human trafficking investigations, I covered the relevant criminal statutes that governed police investigations. A discussion of these laws is below.

A. Federal human trafficking laws

The primary law governing the trainings I gave law enforcement on human trafficking was the Trafficking Victims Protection Act of 2000: In 2000, Congress enacted the Trafficking Victims Protection Act (TVPA) to criminalize human trafficking. TVPA defines human trafficking as:

- (a) Sex trafficking in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age; or
- (b) The recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, through the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery (22 U.S.C. § 7102).

The exploitation of a minor for commercial sex is human trafficking, regardless of whether any form of force, fraud, or coercion was used.¹⁴

Under federal law, coercion means (a) threats of serious harm or physical restraint, (b) any scheme, plan, or pattern intended to cause a person to believe that failure to perform an act would result in serious harm or physical restraint against any person, or (c) the abuse or threatened abuse of the legal process.¹⁵

TVPA created five new Title 18 criminal statutes:

- 18 USC § 1589
- 18 USC § 1590
- 18 USC § 1591
- 18 USC § 1592
- 18 USC § 1594

¹⁴ DOJ website – Human Trafficking, *What is Human Trafficking*, accessed July 7, 2023, www.justice.gov/humantrafficking/what-is-human-trafficking

¹⁵ 22 U.S. Code § 7102 (3) Coercion.

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Sex trafficking is a state crime. Federal law makes it a federal crime to conduct the activities of a sex trafficking enterprise in a way that affects interstate or foreign commerce. Title 18, U.S. Code, Section 1591 now provides in part the following:

“Whoever knowingly in or affecting interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States recruits, entices, harbors, transports, provides, obtains, advertises, maintains, patronizes, or solicits by any means a person; knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, coercion..., or any combination of such means will be used to cause the person to engage in a commercial sex act, or that the person has not attained the age of 18 years and will be cause to engage in a commercial sex act,” shall be imprisoned not less than 15 years.”

The TVPA was reauthorized (TVPRA) in the following years:

- 2003 (TVPRA 2003), Pub. L. No. 108-193
- 2005 (TVPRA 2005), Pub. L. No. 109-164
- 2008 (TVPRA 2008), Pub. L. No. 110-457
- 2013 (TVPRA 2013), Pub. L. No. 113-4
- 2015 (TVPRA 2015), Pub. L. No. 114
- 2017 (TVPRA 2017), Pub. L. No. 115-393, Pub. L. No. 115-427
- 2018 (TVPRA 2018), Pub. L. No. 115-425

B. Georgia State human trafficking laws

Georgia’s Human Trafficking Law OCGA §16-5-46 was enacted in 2006 (Senate Bill 529), and became effective July 1, 2007. It made it illegal for those who “knowingly subjects or maintains another or knowingly recruits, entices, harbors, transports, provides, or obtains by any means another person for the purpose of sexual servitude.”

In 2008, Georgia’s General Assembly created the Commercial Sexual Exploitation of Minors Joint Study Commission (Senate Resolution 445), with legislation amending the Mandatory Child Abuse Reporting Law adding child prostitution to the forms of abuse that must be reported to authorities.

On March 29, 2011, the Georgia Senate Passed HB 200 Combating Sex Trafficking, taking new steps toward protecting victims of sex trafficking. It became effective July 1, 2011. Georgia’s human trafficking laws defines two different kinds of servitude associated with trafficking offenses:

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- Labor Servitude: work or service of financial value obtained from a person through coercion or deception,¹⁶ and
- Sexual Servitude: any sexually explicit conduct or performance for which anything of value is given where the conduct was induced or obtained through coercion or deception or the conduct was induced or obtained from a person under the age of 18.¹⁷

In 2012, the Georgia General Assembly passed HB 1176, which amended the Mandatory Child Abuse Reporting Law to include sexual exploitation in the definition of sexual abuse of minors.

In 2013, the Georgia Legislature passed HB 141, which required certain businesses and venues to post the number of the National Human Trafficking Hotline (OCGA §16-5-47), effective September 15, 2013.

When I gave trainings in Georgia in 2011-2012, I covered the above laws and disseminated relevant information to law enforcement.

C. Laws requiring hotels to address human trafficking in 2011

During or before 2011, there were no federal or state laws in Georgia that required hotels to train their employees about human trafficking, how to deter and prevent crime, or foresee criminal activities. During or before 2011, there was also no mandated human trafficking training in Georgia for private security company employees.

When I taught courses to law enforcement agencies in Georgia to train them on human trafficking, the only laws covered were TVPA and its reauthorizations and Georgia's OCGA §16-5-46 and their amendments.

Laws requiring hotels to train their employees about human trafficking first appeared in 2018, when California Governor Jerry Brown approved Senate Bill 970, which requires hotels and motels subject to the Fair Employment and Housing Act to provide at least 20 minutes of classroom or other effective interactive training and education regarding

¹⁶ Georgia O.C.G.A. § 16-5-46 (3)

¹⁷ Georgia O.C.G.A. § 16-5-46 (6)

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human trafficking awareness to each employee likely to interact or come into contact with victims of human trafficking.¹⁸

In 2019, Florida Governor Ron DeSantis signed into law legislation directing mandatory human trafficking awareness training for lodging employees.¹⁹ In 2021, ECPAT USA released a report on mandated anti-trafficking training for hotel personnel by state, and reported the following states required human trafficking awareness training: CA, CT, FL, IL, MN, NJ, and TX.

¹⁸ California Hotel & Lodging Association, *California Hotel & Lodging Association Statement on SB 970, Gov. Brown Signs Human Trafficking Awareness Bill*, September 28, 2018.

¹⁹ Florida Restaurant & Lodging Association (FRLA), *Human Trafficking Training*, www.frla.org/human-trafficking/, accessed July 2, 2023

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V. HUMAN TRAFFICKING ISSUES, TRAININGS, AND INVESTIGATIONS IN GEORGIA

In this section, I will:

- A. Discuss comments government officials in Gwinnett County made about human trafficking between 2010 and 2013.
- B. Discuss my trainings of Georgia Police Officers on Human Trafficking Issues.
- C. Discuss Metro Atlanta's efforts to arrest prostitutes before 2013.
- D. List human trafficking arrests in Georgia reported to the FBI 2013-2018.

A. Comments by officials in Gwinnett County about human trafficking

2010 by Gwinnett County Police Department

On November 9, 2010, the Atlanta Journal-Constitution reported that a 15-year-old girl notified the police of sexual abuse in 2008 by Peter Privateer, a CEO of an Atlanta-based data security company. Privateer was arrested for child molestation by Gwinnett County Police Department ("GCPD"). GCPD spokesman Corporal Brian Kelly reportedly said to a reporter that "incidents of child sex trafficking are very rare in Gwinnett."²⁰

2013 by Gwinnett County District Attorney's Office

On January 24, 2013, WABE 90.1's Denis O'Hayer interviewed Gwinnett County District Attorney ("DA") Danny Porter regarding a recent Georgia House-Senate report on human trafficking in Georgia, which stated the following:²¹

- In 2012, DeKalb County DA's Office had six human trafficking cases
- In 2012, Fulton County DA's Office had five human trafficking cases
- In 2012, GBI had 32 open human trafficking cases

²⁰ Atlanta Journal-Constitution, *CEO tied to child-sex trafficking*, 11/9/2010, updated 1/25/2016.

²¹ www.wabe.org, accessed July 5, 2023

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DA Porter did not mention any human trafficking arrests in Gwinnett County. He stated that he had concerns about the claim that there was a high number of human trafficking in Georgia, and he questioned those numbers. DA Porter stated “we don’t know if we have a problem, or how many cases we have.” DA Porter added that there was a tremendous amount of prostitution going on, but he did not think that you could make the next jump that there is coercion into prostitution.

DA Porter stated to Mr. O’Hayer that there was a new term for when a person voluntarily, without coercion, enters into prostitution, called “self-exploited,” which did not make sense to him. When asked by Mr. O’Hayer whether a child can make that determination if they think they can, DA Porter replied “legally no, but you can’t call it human trafficking unless someone is trafficking them.”

B. Training Georgia police officers on human trafficking issues

In early 2011, I was contacted by a former police officer from Metro Atlanta, who was disappointed that there were no formal courses offered to his police friends on how to investigate human trafficking crimes. I agreed to create a course for Metro Atlanta police officers oriented to a city police officer, a deputy sheriff, or a state trooper.

After learning that police officers there were “behind the curve” and still not arresting human traffickers under state laws, I tweaked the course to show students the value of OCGA §16-5-47, rather than “referring” the case to the feds.

Upon arrival to my first course in Georgia, I found officers unmotivated to arrest human traffickers using state laws. Knowing that there were arrests of children for prostitution in Georgia, but not the men who were receiving sexual services from them, I spent time teaching officers that minors were not performing sex acts voluntarily. I spent additional time discussing OCGA §16-5-47 and how neighboring states like North Carolina had many human trafficking arrests using state laws. During this course presentation, it was clear to me that human trafficking was a new law enforcement topic for most of the student attendees in 2011 and 2012.

C. Metro Atlanta Police investigations of human trafficking in 2010-2011 police departments in Gwinnett County

The following is a list of police departments in Gwinnett County, Georgia:

- Auburn Police Department
- Braselton Police Department
- Duluth Police Department

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- Georgia Department of Public Safety – Post 51
- Gwinnett County Police Department
- Lawrenceville Police Department
- Lilburn Police Department
- Loganville Police Department
- Norcross Police Department
- Snellville Police Department
- Suwanee Police Department

During the development of my 2011 training course in Georgia, I maintained a folder of all news stories in Georgia related to human trafficking investigations, in addition to speaking to many Metro Atlanta police officers about this crime problem. I came to the conclusion that there were no human trafficking arrests using state laws by local, county, or state law enforcement agencies in Gwinnett County between 2010-2011.

Rather, as seen below in Table 1, human trafficking arrests made in the Metro Atlanta area through 2011 used the federal statutes. “Metro Atlanta” includes the following eight counties: Fulton, DeKalb, Gwinnett, Cobb, Clayton, Douglas, Fayette, and Henry.

Table 1 is on the next page of my report.

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Table 1: Federal Human Trafficking Arrests in Metro Atlanta Before 2012					
Year of Trafficking	Venue of Crime	Arrested	Lead Agency	Charges Filed	Year Sentenced
2005	Atlanta		FBI	Federal	2008 ²²
2005	Suwanee		DHS HSI	Federal	2011 ²³
2008	Atlanta		DHS ICE	Federal	2009 ²⁴
2008	Cobb Co.		FBI	Federal	2012 ²⁵
2009	Metro Atlanta		MATCH	Federal	2011 ²⁶
2009	Metro Atlanta		MATCH	Federal	2011 ²⁷
2010	Metro Atlanta		MATCH	Federal	2012 ²⁸
2011	Atlanta		DHS HSI	Federal	2014 ²⁹

MATCH = Metro Atlanta Child Exploitation Task Force

DHS = Department of Homeland Security

HSI = Homeland Security Investigations

ICE = Immigration and Customs Enforcement

²² DOJ Press Release, *GA Man Sentenced to 15 Years on Sex Trafficking & Mann Act Charges*, 1/24/2008.

²³ DOJ Press Release, *GA Woman Sentenced to 140 Months in Prison for Human Trafficking*, 10/13/2011.

²⁴ DOJ Press Release, *Key Member of Atlanta Human Trafficking Ring Pleads Guilty to Sex Trafficking Charges*, 7/30/2009.

²⁵ DOJ Press Release, *Georgia Man Sentenced to 17 Years in Prison for Sex Trafficking of a Minor*, 3/21/2012.

²⁶ FBI Press Release, *Atlanta Man Sentenced for Sex Trafficking of Minors*, 8/3/2011.

²⁷ FBI Press Release, *Convicted Felon Sentenced for Sex Trafficking of a Minor*, 12/5/2021.

²⁸ FBI Press Release, *Man Who Operated Sex Trafficking Ring Sentenced to Life in Federal Prison*, 9/19/2012.

²⁹ DHS ICE Press Release, *GA man who attempted to buy child for sex sentenced to 10 years*, 2/20/2014.

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Drug use, prostitution, and gambling are commonly referred to as “vice crimes” because they represent behavior that the public views as contrary to what is moral and virtuous. The traditional role of the police vice unit has been to investigate vice-related crimes such as prostitution, gambling, bookmaking, pornography, and problems associated with alcoholic beverages. The act of prostitution has historically been viewed by police as a chosen lifestyle. However, in human trafficking cases, vulnerable people are manipulated into a life of prostitution by exploiters, which many vice officers before 2012 did not recognize, based on my teachings in and around Georgia between 2011-2017.

D. Human trafficking reporting, training, and offenses in Georgia

The FBI’s Uniform Crime Report (“UCR”) Program generates statistics to provide information to law enforcement agencies, researchers, the media, and the public. It includes data from more than 18,000 city, county, state, tribal, and federal law enforcement agencies.

It was not until 2013 that the FBI UCR Program began collecting offense and arrest data regarding human trafficking. It required the FBI to collect data and make distinctions between prostitution, assisting or promoting prostitution, and purchasing prostitution. The UCR Program created the following two new offenses in the UCR’s Summary Reporting System and the UCR’s National Incident-Based Reporting System:

- Human Trafficking/Commercial Sex Act
- Human Trafficking/Involuntary Servitude

Georgia did not submit any reports of human trafficking arrests to the FBI from 2013 through 2018,³⁰ as shown in Table 2.

Table 2: HT Cases That Georgia Police Reported to The FBI		
Year	Commercial Sex Act Offenses	Involuntary Servitude
2013	Did not report	Did not report
2014	Did not report	Did not report
2015	Did not report	Did not report
2016	Did not report	Did not report
2017	0	0
2018	0	0
2019	48	6

³⁰ See *Crime in the United States, Human Trafficking reports*, individually for 2014, 2015, 2016, 2017, and 2018, written by FBI Criminal Justice Information Services Division special report.

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The first known attempt to quantify the extent of human trafficking in Georgia was in 2012 by the Georgia Bureau of Investigation (“GBI”), which documented an attitude by law enforcement that some minors in the sex trade were there willingly, and that the prevalence of human trafficking in Georgia was exaggerated.³¹ I am aware that between 2006 and 2015, local law enforcement in Georgia had a reputation for arresting children for prostitution, but not the men that exploited them.³²

The first known human trafficking training for police offered by the Georgia Public Safety Training Center was in 2018. Their two-hour online course provides public safety personnel with information needed to help identify potential cases of human trafficking. The course contains tips for interacting with possible victims, including how to approach and communicate with them in a way that enhances cooperation and furthers the investigation.³³

██████████, was convicted of human trafficking in February 2014 in Fulton County, Georgia. Spencer was arrested on October 20, 2012, along with his associates, ██████████. According to authorities, ██████████ may be the first “John” to be convicted of human trafficking in Georgia.³⁴

³¹ Cook, Rhonda, “Human Trafficking Documented in Georgia.” *The Atlanta Journal Constitution*, May 2, 2014.

³² During my 2006-2010 FBI human trafficking work, I handled cases that were linked to Atlanta, and took trips to meet with FBI Atlanta Field Office. While there, I learned that local police were not arresting human traffickers under state laws; however, they were arresting children. Newspaper articles from then and FBI UCR reports indicated children in Georgia were arrested for prostitution. That changed in 2016, after probable pressure from NGO and federal agencies convinced Georgia officials to stop arresting children.

³³ Georgia Public Safety Training Center Press Announcement, *GPSTC Announces New Human Trafficking Online Course*, 9/5/2018.

³⁴ The Atlanta Journal-Constitution, *Fulton County: Pimp gets life sentence for sex crimes against 2 teen girls, “John” gets 5 years*, February 27, 2014.

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VI. THE ROLE OF LAW ENFORCEMENT IN HUMAN TRAFFICKING**A. Who is responsible for stopping human trafficking?**

Crime is a police problem. Citizens and businesses can help prevent crime, but usually by installing sufficient outdoor lighting to deter burglars, the use of automated timers to turn lights on or off, and using quality door and window locks. It is not the responsibility of businesses and citizens to foresee activities of criminal enterprises that covertly commit crimes. It is the job of the police.

Police are responsible for maintaining public order, enforcing laws, and preventing, detecting, and investigating criminal activity. In addition to the police, the other parts of the criminal justice's major components to prevent or detect human trafficking include local district attorneys and the courts. City police departments, county sheriffs, and the state police are the state level entities that can arrest and prosecute human traffickers. When they do not train their personnel on how to identify human traffickers, or prioritize those types of investigations, human traffickers can "run free."

Since many aspects of human trafficking involve organized crime/criminal enterprises that may harm people, law enforcement often asks businesses and citizens to "report human trafficking," and not to directly confront it. Combating human traffickers requires a comprehensive, multidisciplinary effort. A city, county or state law enforcement agency should train all of their officers with the skills needed to identify human trafficking, with coordination with federal efforts.

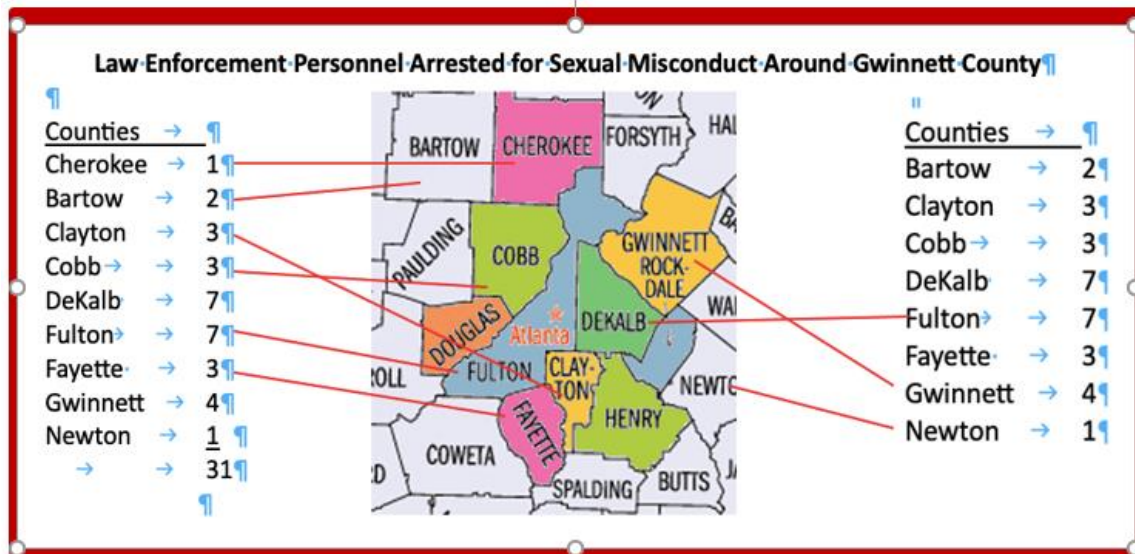
B. Law enforcement sexual exploitation misconduct in Gwinnett County

Despite human trafficking being a law enforcement problem, another cause of human trafficking occurring in some neighborhoods involves police misconduct when officers engage in sexual activities with children or women that they come in contact with. Human trafficking victims are taught by their traffickers to distrust the police. When those victims are sexually exploited by police officers, or they see sexual misconduct by police officers, they rarely report human trafficking crimes to authorities. And sex trafficking may increase in a community.

Metro Atlanta, which includes Gwinnet County, has a large number of police officers arrested for sexual misconduct, as shown in Figure 1:

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Figure 1



A review of 50 law enforcement officers in Georgia arrested and/or fired for sexual misconduct, revealed 31 in Metro Atlanta (Figure 1), involving the following types of charges:

- 2nd degree child cruelty
- Child exploitation and child molestation
- Groping (on duty)
- Sexual assault of a person in custody
- Sexual exploitation of a minor
- Sexual materials given to a minor
- Pandering
- Rape
- Sodomy

I have seen in my law enforcement career, which included an assignment in 1993 to a public corruption squad, that officers involved in sexual misconduct do not fully enforce crimes like pandering, rape, sexual abuse, or sexual exploitation. If a community is experiencing crimes like those, and they cannot explain why it is happening, they should consider government corruption may be partly the cause of it, i.e., the police are not enforcing those types of crimes.

The following law enforcement officers from Gwinnett County have been arrested for sexual misconduct:

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- a. 2012: Corporal Brian Kelly,³⁵ GCPD, was arrested for soliciting a prostitute during a sting operation conducted by the Barrow County Sheriff's Office.³⁶ Corporal Kelly was identified in 2010 as a problem officer when his department found evidence that he had sent lewd photos of himself to a co-worker. GCPD Chief Charles Walters chose not to fire Kelly in 2010 and suspended him for 80 hours.
- b. 2017: Assistant District Attorney Christopher Quinn, Gwinnett County District Attorney's Office, was charged with pandering and violation of Georgia's felony racketeering statute. He was one of 56 people arrested when Dunwoody Police Department cracked down on the "Gold Club" and "Lipstick and Shoes," which authorities described as high-end escort services operating out of local apartment complexes.³⁷
- c. 2022: Officer Kevin Day, Norcross PD, was arrested for pandering while on duty.³⁸
- d. 2023: Officer Breonna Jones, GCPD, was arrested for child molestation in South Carolina, and extradited to Butts County, GA. According to GBI, Jones and a 31-year-old man helped a 29-year-old woman travel to another state "to avoid arrest and conceal evidence of this crime."³⁹

³⁵ Some news articles spell Kelly's name Kelley.

³⁶ The Atlanta Journal-Constitution, *Ex-Gwinnett police spokesman charged with soliciting prostitute*, 6/12/12.

³⁷ Tyler Estep, Reporter for The Atlanta Journal-Constitution, *2 weeks after prostitution arrest, Gwinnett prosecutor still working*, 1/31/17.

³⁸ Kimberly Sizemore, Reporter for AccessWDUN.com, *Norcross police officer charged with "immoral and illegal conduct" while on duty*, 1/19/22.

³⁹ 11Alive.com, *One of four arrested in Butts County child exploitation case was Gwinnett County Police Officer*, 6/8/23.

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VII. CONCLUSION

It is my opinion in this case there were no human trafficking arrests in Gwinnett County, Georgia, at the time of Plaintiff's alleged trafficking. I noted federal human trafficking arrests in Table 1, none of which were in Gwinnet County. Even when Plaintiff was "rescued" by GCPD, they arrested the person that she was with for prostitution, with no mention at of human trafficking.

After TVPA was passed in 2000, and states followed with passing state laws against human trafficking, the crime of human trafficking appeared to take a back seat to other police priorities in Metro Atlanta, such as violence and drugs. Police seemed reluctant to look at traditional crime categories such as prostitution through a different lens and reclassify "offenders" such as prostitutes as victims. I know that Atlanta area police failed to train their officers on what human trafficking is during the relevant period of 2011 through January 19, 2012. Such was the situation when I arrived in Metro Atlanta on November 20, 2011, to teach the first of four advance instructor-led law enforcement human trafficking investigation courses in Cobb County, Georgia, a neighbor of Gwinnett County. Attending officers had no history of training about human trafficking, few knew about Georgia's human trafficking laws, and their supervisors were not tasking or supporting them to develop those types of cases. However, after receiving complements about my three-day presentations, I was invited back to teach on April 25, 2012, at the same location (Kennesaw PD). That showed me their interest to learn, even though their department had never arrested a human trafficker.

There is a range of different types of sexual exploitation, from child abuse and sexual assault. On one side of the spectrum is prostitution, which is the practice of engaging in sexual activity with someone for payment. On the other side, is people forced into the sex industry through force, fraud, or coercion.

The act of prostitution has historically been viewed by police across the country as a chosen lifestyle. TVPA taught us that in human trafficking cases, vulnerable people are manipulated into a life of prostitution by exploiters, which many vice officers before 2012 did not know.

Respectfully submitted on July 26, 2023,

Greg H. Bristol

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